

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Universal Service Reform)	WT Docket No. 10-208
)	
Mobility Fund)	
)	

**COMMENTS OF
MTPCS, LLC D/B/A CELLULAR ONE**

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MTPCS, LLC d/b/a Cellular One and its affiliates (collectively, “MTPCS”) hereby submit comments in response to the Notice of Proposed Rule Making (“*Notice*”) in the above-captioned docket.¹ MTPCS is a facilities-based wireless carrier formed in 2005, which through diligent construction and coverage now, with its affiliates, provides switched wireless GSM voice and data communications services, including cellular, PCS and satellite services, on its networks to more than 160,000 customers in rural Montana, Wyoming, Texas, Oklahoma, Louisiana, and the Gulf of Mexico. GSM is the most widely adopted wireless standard in the world, with more than 4 billion connections, in more than 219 countries, worldwide.²

I. The Overall Design of the Mobility Fund Should Encourage the Use of Existing Infrastructure by All Eligible Carriers and Relate Logically to CAF Funding.

The Broadband Mobility Fund should capitalize on existing infrastructure. Rather than funding construction of many new towers by a single carrier, the Commission should grant

¹ / Notice of Proposed Rule Making, *In the Matter of Universal Service Reform Mobility Fund*, WT Docket No. 10-208, FCC 10-182 (October 14, 2010) (“*NPRM*” or “*Notice*”).

² / Source: GSMA (the GSM Association): Market Data Summary (Q2 2009), http://www.gsmworld.com/newsroom/market-data/market_data_summary.htm ; <http://www.gsmworld.com/about-us/index.htm> .

smaller amounts of support to numerous carriers. This enables broadband upgrades to existing infrastructure, and minimizes the time-consuming and costly acquisition, zoning and construction process for new sites. The result will be faster deployment of upgraded services.

The Commission could fund several carriers in each area without expending a larger total amount by making funding portable. Partial funding of numerous carriers, as discussed in more detail on the following pages, will facilitate the extension of the current, thriving mesh of technologies so as to support qualifying mobile broadband solutions, without costing more than a single-carrier system. As a result, each of the existing protocols, such as CDMA and GSM, could be extended at broadband speeds, to the benefit of consumers in high cost areas.

Participation in the Broadband Mobility Fund should create a presumption of eligibility for Connect America Funding. One-time grants for broadband deployment to a single carrier per area will not produce sustainable mobile networks. Certain proposals in the *Notice*, combined with the single-carrier funding suggestions for CAF, place a risk on carriers and the public that funds will be expended for a broadband deployment, but then the carrier would not receive the subsequent CAF funding necessary to maintain complex equipment in a rural area. The Commission should not fund broadband deployment but then refuse to provide support for continued maintenance; that would waste carriers' funds and the Broadband Mobility support.

Mobility Fund supported broadband infrastructure should be supported long term, not abandoned due to an abrupt cessation of funding. Failure to transition these facilities with maintenance support would waste taxpayers' moneys spent on the broadband deployment.

II. The Mobility Fund Should Support More Than a Single Provider Per Area.

Single-provider awards would improve the service speeds of only one provider. A single carrier with government support could decimate the competition across a large region. The government should not essentially choose a winner and losers in the marketplace. As evidenced

by the state of telephone technology prior to the breakup of the Bell System, or the effects of railroad trusts, there are times when monopoly stifles healthy competition, innovation, and service choices. The government should not produce or facilitate monopolies; their effects are not in the public interest.

The agency should instead achieve the marketplace benefits of having several companies compete on a level playing field by dividing up the support for a region – allocated on a per-customer basis in the supported area, moving from carrier to carrier with the customer. The funding, then, would not be duplicative, and fewer carrier jobs and customer service plan options would be lost, as competition would remain healthy.

A “per-customer” approach to an auction is already suggested by the Commission. Support amounts also could be allocated to several carriers based upon their customer numbers in the areas they propose to serve with broadband.

III. We Agree Applicants Should Be Previously Designated Wireless ETCs.

We agree with the proposal³ that applicants for Mobility Fund support should be designated wireless ETCs covering the relevant geographic area, or at least within the state at issue, prior to participating in a Mobility Fund auction. We do not believe that simply having applied for ETC designation is sufficient; in order to participate in the auction for an area, it is logical that the applicant should have actually received wireless ETC designation within that state, through the existing designation processes at the state or federal level. This ensures that carriers’ qualifications have been scrutinized in the same rigorous, lengthy process that all eligible carriers have undergone, examining a wide variety of aspects of the carrier’s ability to provide service in the public interest.

³ / *NPRM*, at ¶ 45.

In addition, we think state commissions will be more accommodating of the process if their own procedures in credentialing funding recipients have been respected.

Certification as to the use of support is sufficient to meet the purpose of ensuring that the funds will, in fact, be used only for the permitted purposes. Failure to comply with a self certification would of course result in penalties; this is more than adequate incentive for compliance.

IV. The Commission Should Not Utilize Reverse Auctions To Compare Offers.

Reverse auctions would allow a well funded competitor with no interest in better serving rural areas to underbid a competitor with an interest in providing higher quality service to a market it knows well. Whether or not the first carrier wins the market, it succeeds in placing a burden on its opponent – the opponent must either give up the broadband funding, or build out at the cost of a company that can purchase equipment at lower wholesale rates. This “race to the bottom” encourages anticompetitive behavior and marketplace manipulation that will defeat the Commission’s goals and result in poor service to customers.

The economic goal of deploying service at the lowest possible cost should be balanced against other meritorious public interest goals. For example, what is the value of a reasonable quality of service comparable with that provided in urban areas, rather than a bare minimum to meet performance standards? What is the value of redundant connections and decent quality equipment, in order to ensure the reliability of access to public safety communications such as 911, E911, and telemedicine? There is certainly value to some choice among services, or the ability to receive some service attributes now viewed by some customers as necessities, such as mobility – particularly of value in high cost areas – or Internet access, short message capabilities or other data transmission attributes, or other enhancements to basic voice service. Is there value to the public in having the ability to choose among service providers, similar to urban areas

where provider choice exists? Without answering these questions, we do not believe the Commission can accurately evaluate whether a reverse auction best achieves the public interest.

We respectfully suggest that a reverse auction model for distributing support would do a disservice to rural states. The single-award reverse auction method would result in service quality and options far below those available in urban areas. As Cellular South and RCA stated in an *ex parte* submission dated November 11, 2010:

Reverse auctions encourage anti-competitive conduct and anti-competitive incentives to participate, including blocking support to competitors or off-setting contributions. Reverse auctions perpetuate a monopoly, at the expense of market-based competition, innovation, consumer choice, competitive prices and new technology.

We agree that reverse auctions will tend to result in a monopoly in these areas, or encourage competitors to enter solely to thwart other companies, which is not beneficial to consumers.

V. The Commission Should Not Auction Support Delineated By Unserved Areas Specified On A Census Block Basis, Using Industry Data Compiled By American Roamer. It Should Instead Determine These Areas By Reference To Existing High Cost Areas In The Universal Service System Or by Reference To Form 477 Information.

The Commission should make Broadband Mobility Fund support available for areas previously identified as high cost through the existing universal service fund program – that is, areas where high cost funding to any carrier, on average throughout the most recent fiscal year, exceeds zero – as well as areas where no carriers provide service yet, or only a single carrier. Carriers’ existing costs of providing service to these areas are good indicators of whether broadband also will be expensive to deploy to these areas. These are remote or otherwise hard to serve areas where transportation costs and costs of sending technicians out are high, or facilities must be repaired when they are damaged repeatedly by natural forces such as snow avalanches or ice storms, rockfalls, cyclones, hurricanes, or the like.

In the alternative, or in order to supplement the foregoing areas with unserved areas, utilizing a method that avoids most potential data inaccuracies or obsolescence, the Commission should identify such areas⁴ by reference to carriers' annual information filings on Form 477. In these filings, carriers identify their speed of service and customer numbers—sorted by census tract. This information, compiled for all carriers in each tract, could be compared to census information regarding the total number of households or individuals in the applicable area, to determine the percentage of households lacking broadband service. The Commission could then determine which percentage of households not receiving broadband would receive funding – for example, funding would be provided in any block within a census tract where broadband subscription rates lag behind the national average.

VI. Relinquished Funds For Which There is Current CETC Eligibility Cannot Legally Be Reserved for Other Uses; These Should Be Immediately Available For CETC Funding. Relinquished Funds Were Contributed Into the Current Support System, Which Designated Them For State CETC Funding.

The Commission requests comment on its authority to implement the proposals in the *NPRM*.⁵ It also seeks comment on whether these proposals require revisions to existing regulations or authority. In addition, the Commission asks whether any alternate proposals are within its existing legal authority or would require expansion of that authority.

In any area where CETCs are not receiving the full amounts for which they would have been eligible absent the cap on CETC funding, relinquished funds should be restored to the existing pool to support provision of high cost services by such CETCs. Conversely, if CETCs are receiving the full amounts for which they would have been eligible absent the cap, MTPCS recommends that the remaining relinquished funds could be reserved by USAC, but if and when

⁴ / See *id.*, ¶ 11.

⁵ / *Id.*, at ¶ 12.

additional CETCs are designated or additional lines added to the CETC eligible lines in the state or territory, support disbursements would promptly be reserved from relinquished funds for those newly eligible lines, and USAC would start reserving a lesser amount each month for broadband use. These proposals, which we think would equally apply to insular areas as well as states, would help ensure that broadband, while important, is not deployed at the expense of customers who only want basic service.

Relinquished support was paid in by customers, in compliance with and subject to the current universal service system, which allocated that support for competitive provision of services by carriers already certificated as eligible through a legal application process, in each state or before this Commission. If funding needed for eligible CETC lines in a state exceeds the capped amount in the state, removing funding and lowering the pool ceilings not only would contravene the legally permissible use of such funds,⁶ as retroactive rulemaking aimed at already-allocated funds, but also would fail to sustain provision of basic services to high-cost-area customers. Any proposal to remove funding that is currently needed to provide support for which carriers are already eligible under the existing program, would roll back wireless and other competitive services, contrary to the desire of rural residents in need of such services, and contrary to the intent of the commissions that designated those carriers as CETCs. We do not believe the Commission would want to subvert the benefits of competitive service in the face of steadily rising subscribership numbers for competitive services.⁷

⁶ / See 47 U.S.C. § 254(e) (universal service support shall be used “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”)

⁷ / In June, 1998, carriers reported approximately 172 million switched local exchange lines and more than 60 million wireless customers. See *Trends in Telephone Service*, Industry Analysis Division, CCB, FCC, at Tables 2.1, 9.3, 17.1 (rel. February, 1999). A decade later, there were approximately 133 million traditional switched access lines and more than 260 million wireless subscribers. See *News Release, Second Local Competition Report* (September 3, 2010);

The source of any legal authority for the Commission to establish universal service funds that are different from the existing funds, or to modify the existing eligibility mechanisms and classifications of funding recipients, is not clear, however, and in our view would not necessarily be derived from the Commission's existing authority under the communications laws.

VII. The Commission Does Not Have Authority To Permit USAC To Reserve CETC Funds When Remaining CETCs Have Eligibility For Funding in the State In Excess of the Capped Universal Service Funding Amount.

In the *Interim Cap Order*,⁸ the Commission stated that the cap “limits the annual amount of high-cost support that competitive ETCs can receive in the interim period for each state to the amount competitive ETCs were eligible to receive in that state during March 2008, on an annualized basis.”⁹ Accordingly, the logical implication, upon which carriers based revised business plans, was that the “annual amount of high-cost support that competitive ETCs can receive... for each state” is at least “the amount competitive ETCs were eligible to receive in that state during March 2008.” Not less.

MTPCS urges the Commission to demonstrate that it values the provision of competitive services in rural areas, and in states where eligibility for competitive basic services exceeds the cap amount, not to permit USAC to reserve funds for other uses.

VIII. Adjusting CETC Caps *Prior to Making Available a Replacement Support Mechanism, Such As A Broadband Mobility Fund, Would Contravene the Universal Service Principles of Competitive Neutrality, “Specific,” “Predictable” and “Sufficient” Support, and is Not Essential to Implementation of the National Broadband Plan.*

September 2010 Trends in Telephone Service, Chart 11.1. Thus, with declining switched access lines and increasing wireless customers, it is logical that CETCs, increasingly more than RBOCs, received universal service support in order to reach rural residents. Rural residents, along with much of the country, have been moving from landline to wireless service. The support needed for provision of service should move with them.

⁸ / *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, FCC 08-122 (2008) (“*Interim Cap Order*”).

⁹ / *Id.*, at ¶ 7.

The National Broadband Plan does not require that competitive carriers lose funding *before* incumbent wireline carriers lose theirs. That would contravene the universal service principles of competitive neutrality, “specific,” “predictable” and “sufficient” support. Section 254(b) of the Communications Act requires that universal service policies ensure that there are “*specific, predictable and sufficient Federal and State mechanisms* to preserve and advance universal service”.¹⁰ In addition, as the Commission is aware, it adopted competitive neutrality as an additional principle of universal service, through the process provided for under the Act.

The Commission’s implementation of the National Broadband Plan should *transition* carriers to provision of broadband services to those who desire them, rather than depriving existing customers of existing supported services. The Commission and USAC should ensure a seamless transition to broadband funding that will not be customer-impacting, rather than *removing* funding for existing basic services, thus potentially resulting in the rollback of infrastructure and supported services from high-cost areas during an unpredictable length of time, and *then* permitting carriers to apply for, and only one carrier per area to receive, broadband funding. This would contravene the principles set forth in the Act, would not be economically viable for the majority of rural carriers, would result in the rollback of basic service in high cost areas, and would benefit carriers that already enjoy marketplace dominance.

IX. More Than One Entity In Each Applicable Area Should Receive Support.

As noted previously, in or adjacent to some areas lacking broadband, there may already exist numerous cell sites, each already serving customers in portions of the area. In order to most efficiently make use of existing assets, a portion of the broadband mobility support should be distributed to each eligible applicant, allocated according to the number of customers the carrier will serve with broadband.

¹⁰ / 47 U.S.C. § 254(b)(5) (emphasis supplied).

Existing cell sites already exist in some areas that lack broadband; why waste these assets? Towers cost several hundred thousand dollars each, plus months to negotiate the land rights. The Commission instead should fund broadband rollout by several carriers, thus capitalizing on the largest quantity of already-existing assets, and reaching more customers with broadband. The funding could be provided over a year, for example, allocated based upon the number of lines each carrier is constructing or converting to broadband, as a percentage of the total number of lines all applicants for the area propose to construct or convert to broadband. This would then neatly tie in to the Connect America Fund, as several carriers would be repurposing existing facilities, resulting in deployment of higher speed technologies to more areas.

- A. *We support the concept of using the population of unserved areas as units for any bidding process.*

As noted in the *NPRM*, “some areas do not have roads or have relatively few roads, so using road miles could present challenges in making comparisons across different unserved areas.”¹¹

- B. *With regard to disbursements of support, we note that 100 percent coverage of unserved areas tends to be impossible to achieve.*

The Commission asks about coverage.¹² For some reason, a small but statistically recognizable percentage of the population chooses to reside on rocky insets in mountainsides or at the bottom of ravines, on enclaves of private property surrounded by federal lands where cell site space cannot be obtained despite repeated requests, on houses surrounded by farms or other large acreages where no landowner is willing to lease cell site space, and in other areas that despite diligent efforts cannot be reached by wireless service. We have experienced this in

¹¹ / *NPRM* at n.29.

¹² / *See id.* at ¶ 92.

Montana, for example, and are grateful that the government of that mountainous state recognizes that 100% coverage cannot be achieved in the real world.

C. In the event auctions are held, multiple rounds will encourage greater deployment than single round auctions.

Single round auctions may be simple to administer, but they do not enable companies to respond to each others' bids, increase the areas for which they are bidding if they notice few companies are bidding for certain areas, make such areas more contiguous, and so forth. A single round may be easy for the Commission, but multiple round auctions should be employed instead, in order to produce logically refined results that ensure carriers will more rapidly roll out broadband to more geographically extensive areas. The auctions need not go on for months; the Commission could set a predetermined date on which the last set of bids would be deemed final.

D. It is appropriate to add the Wireless Bureau as a point of contact for the Administrator, given its expertise concerning mobility.

We agree that, as suggested in the *NPRM*,¹³ it would be appropriate to add the Wireless Telecommunications Bureau as a point of contact for the USF Administrator for policy questions pertaining to the Mobility Fund. The Wireless Bureau has knowledge that would prove helpful to the Administrator in connection with funding of mobile service providers.

X. The Proposed Performance Guarantees Would Be Counterproductive. Expansion Or Upgrading Of Existing Networks Is Ordinary Course Of Business And Should Not Be Cause For Burdensome Financial Hindrances.

Successful applicants should not be required to post financial security as a condition of support.¹⁴ We believe this is unnecessary and counterproductive. The Commission proposed, and we agree, that only already authorized ETCs should be permitted to participate in the funding application process; applicants will almost certainly be existing carriers with the ability

¹³ / *Id.*, at ¶ 78.

¹⁴ / *Id.*, at ¶ 85.

to deploy or upgrade broadband. The proposed financial requirements are onerous and would further the likelihood that the process is not competitive. In the unlikely event a carrier becomes insolvent, another carrier would purchase and operate the broadband assets, so they would continue to be utilized in the public interest. *It is better that a company put the Broadband Mobility support to good use with some risk another will ultimately own and maintain those assets, rather than that too few companies qualify to ensure the integrity of the process.*

The Commission asks how to determine a letter of credit amount.¹⁵ This question is only relevant if the paradigm is building an entirely new network. The reality is far more likely to be the evolutionary expansion of an existing network. From an economic standpoint, applicants are most likely to propose broadband deployment in areas adjacent to their existing facilities; this would be their most efficient approach. Expanding a network, while it requires funding, is well within the expertise of the proposed pool of applicants and not sufficiently unusual in scope as to require a letter of credit.

The Commission asks what events would constitute a default so as to permit a final draw upon a letter of credit, and how to safeguard against claims in the event of bankruptcy other than the LOC.¹⁶ A LOC requirement could fatally impair a company's ability to obtain private or public markets funding, thereby defeating its intended purpose. Many carriers, like other businesses, engage in frequent funding and expansion cycles. Already existing senior lenders who finance larger portions of a company's assets and operations would insist upon retaining their primary status. This would prevent many qualified companies from entering the application process for Mobility funding, and vastly less expansion of broadband would result.

¹⁵ / *Id.*, at ¶ 86.

¹⁶ / *Id.*, at ¶ 87.

As an alternative, the Commission asks whether to require winning bidders to guarantee completion of construction by obtaining performance bonds. This, too, appears to assume a successful applicant is building an entirely new network. In fact, participating carriers are most likely to be expanding or upgrading existing networks, a situation well within their ordinary scope of business. Bond requirements would financially hinder applicants that the agency should be motivated to keep competitively strong.

XI. Conclusion.

MTPCS urges the Commission to fund several carriers in each area, not one. This can be achieved *without* expending a larger total amount, by making funding portable. This will result in more efficient broadband deployment, and consumers also will benefit from a choice among a variety of technology solutions and service plans. Administratively, USAC is already well versed in calculating distributions of portable funding, as CETC USF support is already portable.

Participation in the Broadband Mobility Fund should create a presumption of eligibility for Connect America Funding. In order to help ensure that only qualified applicants will participate, we agree that each applicant already should have received ETC designation within the applicable state, through the existing designation processes at the state or federal level.

Regarding auction design, we support the use of unserved area population numbers as units for any bidding process. We respectfully suggest, however, that reverse auctions should not be used, because the economic goal of deploying service at the lowest possible cost creates a “race to the bottom” and contravenes other meritorious public interest goals. Reverse auctions need not be used if all eligible applicants are funded based upon the number of lines they serve in eligible areas with Mobility Fund supported broadband, as described above. Regarding the

number of rounds in auctions, multi-round auctions will permit adjustments to provide a desirable combination of markets for each bidder, resulting in optimum deployment.

Applicable areas for support could be determined by comparing Form 477 information on existing broadband deployments with census information to determine the percentage of households lacking broadband service.

The Commission does not have legal authority to permit reservation of relinquished funds in areas where CETCs are not receiving the full amounts for which they would have been eligible absent the cap on CETC funding. Relinquished support was paid in by customers in compliance with and subject to the current universal service system. Removing such support from the CETC pools would contravene the legally permissible use of such funds.¹⁷

In light of their expertise, it would be appropriate to add the Wireless Telecommunications Bureau as a point of contact for the USF Administrator for policy questions pertaining to the Mobility Fund.

With regard to disbursements, we note that 100 percent coverage of unserved areas tends to be impossible to achieve. In our experience, a statistically recognizable percentage of the population resides in areas that cannot be reached with wireless coverage, whether as a result of inaccessible terrain or the unwillingness of landowners to lease or sell land in the vicinity of the prospective customers.

Finally, winning bidders should not be required to post financial security as a condition of support. The Commission's proposals that participants be ETCs and that a reverse auction be employed, will assure viable, responsible bidders and low bids. The proposed financial security measures generally could not be met due to many companies' existing lender requirements, thus

¹⁷ / See 47 U.S.C. § 254(e) (universal service support shall be used "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.")

increasing the likelihood that many companies will not participate in the process. It is better that a company put Broadband Mobility support to good use with some risk another will ultimately own and maintain those assets, rather than that too few companies qualify to ensure the integrity of the process.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on December 16, 2010, I caused a true and correct copy of the foregoing Comments to be served by electronic mail on the following:

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